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DOC #:	
DATE FILED:	7/22/15

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**MEMO ENDORSED**

July 21, 2015

VIA ECF

Hon. Colleen McMahon  
United States District Judge  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

Re: A.F. of L. -A.G.C. Building Trades Welfare Plan v. Actavis, PLC et al.  
1:15-cv-04406 (CM)

Dear Judge McMahon:

We represent Defendant Wockhardt USA LLC ("Wockhardt USA") in this action. We write to request an extension of time to answer, move, or otherwise respond to the Complaint from July 27, 2015 to October 5, 2015. This is the first request for an extension of time and Plaintiff consents to the extension as reflected in the accompanying proposed Stipulation.

We understand that other defendants, completed a waiver of service and have until October 5, 2015 to respond to the Complaint. Wockhardt USA was served with the Complaint and only has until July 27 to respond. Wockhardt USA, with Plaintiff's consent, seeks this extension of time to respond to the Complaint so as to correspond with that of the other defendants. Given the October 5 deadline for the other defendants, Wockhardt USA's extension will not result in any delay.

We appreciate the Court's attention to this request.

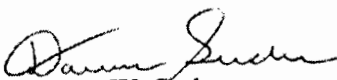
7/22/2015  
Oct 5 is fine for all  
answer the  
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Sept. 11  
R

Colleen McMahon

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July 21, 2015  
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Respectfully submitted,

  
Damon W. Suden